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BY ECF

Honorable Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: GEICO, et al., v. Epione Medical, P.C., et al., 1:18-cv-03159

Dear Judge Bulsara,

We represent the Defendants in this matter and write in response to the Court's request for a scheduled update.

Since our last appearance, Plaintiffs have deposed one defendant in this matter and the parties have agreed to a schedule for the completion of depositions for all remaining defendants.

We have yet to work out a schedule for the deposition of Plaintiffs' investigative representatives and have encountered a discovery issue that the parties are presently making efforts to resolve without the Court's intervention.

We have also engaged in continued settlement discussions. Most recently after a discussion today with Plaintiffs' counsel, although Defendants are open to a settlement conference, Plaintiffs have expressed their belief that we are too far apart in settlement numbers to involve the Court at this time and that additional discovery is necessary to inform further attempts to possibly resolve this matter. In this regard, the parties have jointly agreed to continue discovery while maintaining open lines of communication for a possible resolution in the future.

Respectfully submitted,

/s/

Abe George
Aaron M. Rubin

Via ECF

All Parties